

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

BLUE SPIKE, LLC

Plaintiff

vs.

TEXAS INSTRUMENTS, INC.,

Defendant.

§ CIVIL ACTION NO. 6:12-CV-499 LED

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

LEAD CASE

CIVIL ACTION NO. 6:12-CV-680 LED

BLUE SPIKE, LLC

Plaintiff

vs.

**L-1 IDENTITY SOLUTIONS, INC. and
MORPHOTRUST USA, INC.,**

Defendants.

DECLARATION OF CELESTE THOMASSON ISO DEFENDANTS' MOTION

I, Celeste Thomasson, do hereby declare and state as follows:

1. I submit this Declaration in support of the Motion to Transfer filed by Defendants L-1 Identity Solutions, Inc. ("L-1") and MorphoTrust USA, Inc. ("MorphoTrust") (collectively, "Defendants"). I reviewed the Complaint filed against L-1 in this matter and understand that Plaintiff Blue Spike, LLC alleges infringement by L-1 of four United States patents by making, using, importing, selling and/or offering to sell fingerprint-based biometric software systems. I have personal knowledge of the facts set forth in this Declaration, except as otherwise

stated. I am competent to testify as to all matters stated, and if called upon to do so, I would testify to the facts set forth in this Declaration.

2. I am the Vice President of Defendant L-1.
3. L-1 is a Delaware corporation.
4. No likely fact witnesses reside in the Eastern District of Texas or elsewhere in Texas. L-1 has no connection to the Eastern District of Texas, and no source of proof with respect to L-1 is located in this District. L-1 has no direct marketing business, and does not employ any sales representatives, within the State of Texas.
5. L-1 is the parent company to Defendant MorphoTrust USA, Inc. ("MorphoTrust"), and is an inactive company with no employees. L-1 is a holding company and has no product revenue.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of December, 2012, in _____.


